



July 8, 2015

Reference No. 038443-12

Ms. Jenny Davison
Interim Remedial Project Manager
United States Environmental Protection Agency
Region V
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60604

Mr. Steve Renninger
On-Scene Coordinator
U.S. EPA Region V
Emergency Response Branch
26 West Martin Luther King Drive
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Dear Ms. Davison and Mr. Renninger:

**Re: Progress Report: June 1 through June 30, 2015
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA]) Docket No. V-W-06-C-852) effective August 15, 2006 (RI/FS ASAOC), and the ASAOC for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 USEPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAOC), for the period of June 1 through 30, 2015.

The next Progress Report for the month of July 2015 will be submitted on or before August 10, 2015. Please note that Conestoga-Rovers & Associates' (CRA's) name was changed to GHD on July 1, 2015.

Significant Developments in this Reporting Period

RI/FS ASAOC Developments

Groundwater sampling of selected monitoring wells was initiated in May 2015 and completed in June 2015.

Removal Action ASAOC Developments

As of June 30, 2015, the status of each building requiring mitigation was as follows:

Building 8 (B&G Trucking):

- 30-day proficiency sampling completed on September 12, 2013, with additional confirmatory sampling completed on January 9, 2014 and March 10, 2014.
- First round of 2015 indoor air (IA) and sub-slab (SS) soil vapor sampling completed on February 17, 2015:
 - Trichloroethene (TCE) concentrations in SS soil vapor samples collected from probe SS-8-A remain greater than Ohio Department of Health (ODH) screening levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in the SS soil vapor.
 - Benzene concentrations in samples from IA locations IA-8-A and IA-8-D were greater than ODH screening levels.
 - GHD noted use of acetylene, kerosene heaters, and the presence of paint during the February 2015 sampling event that may have contributed to the elevated IA concentrations.
- Next step: Complete second round of 2015 IA and SS soil vapor sampling in July 2015.

Building 9 (B&G Trucking):

- 30-day and 180-day proficiency sampling completed on October 24, 2013 and March 10, 2014, respectively, with additional 180-day confirmatory sampling completed on May 20, 2014.
- First round of 2015 IA and SS soil vapor sampling completed on February 17, 2015:
 - TCE concentrations in samples collected from SS soil vapor probe SS-9-A remain greater than ODH screening levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in the SS soil vapor.
 - Benzene was detected in IA samples at concentrations less than ODH screening level during the May 2014 sampling event but was detected at concentrations greater than the ODH screening level in the February 2015 sampling event.
 - GHD noted use of acetylene, kerosene heaters, and the presence of paint during the February 2015 sampling event that may have contributed to elevated IA concentrations.
- The available evidence, summarized in the revised memorandum distributed on July 10, 2014, indicates that IA benzene and xylenes concentrations detected during Vapor Intrusion (VI) sampling are a result of ongoing daily human activities within and around Building 9, and are not the result of a complete VI pathway.
- Next step: Complete second round of 2015 IA and SS soil vapor sampling in July 2015.

Building 12 (Overstreet Painting and S&J Precision):

- 30-day proficiency sampling completed on October 24, 2013. A corrective action was implemented on March 6, 2014 and additional confirmatory sampling was completed on April 2 and 3, 2014.
- First round of 2015 IA and SS soil vapor sampling completed on February 18, 2015:
 - TCE concentrations in SS soil vapor samples remain greater than ODH screening and action levels.
 - cis-1,2-Dichloroethene (cis-1,2-DCE) concentrations in SS soil vapor samples have decreased to less than the ODH screening level.
 - Benzene remains present in IA samples at concentrations greater than ODH screening levels; however, based on the available data, the benzene concentrations in indoor air are a result of ongoing daily human activities within and around Building 12, and are not the result of a complete VI pathway.
- Next step: Complete second round of 2015 IA and SS soil vapor sampling in July 2015.

Building 14 (Bullseye Amusements):

- 30-day proficiency sampling completed on January 16, 2014 and 180-day proficiency sampling completed on June 3, 2014.
- First round of 2015 IA and SS soil vapor sampling completed on February 19, 2015:
 - Historically, TCE and 1,1-dichloroethane (1,1-DCA) were present in SS soil vapor samples from location SS-14-A however, concentrations were less than ODH screening levels in February 2015 in GHD's samples. Split samples collected by USEPA indicated that 1,1-DCA remains present at location SS-14-A at concentrations greater than ODH screening levels.
 - Benzene concentration in the indoor air sample collected from IA-14-C was less than the ODH screening level in the February 2015 sample.
- Next step: Complete second round of 2015 IA and SS soil vapor sampling in July 2015.

Building 15 (SIM Trainer):

- 30-day proficiency sampling completed on February 13, 2014. A corrective action was implemented on April 6, 2014 and additional confirmatory sampling was completed on April 24, 2014.
- First round of 2015 IA and SS soil vapor sampling completed on February 18, 2015:
 - There were no IA or SS exceedences during the February 2015 sampling round.
- Next step: Complete second round of 2015 IA and SS soil vapor sampling in July 2015.

Building 17 (Megacity Construction):

- 30-day and 180-day proficiency sampling completed on January 16, 2014, and June 3, 2014, respectively.
- 1-year proficiency sampling completed on February 19, 2015.

- There were no IA or SS exceedances during the February 2015 sampling round.

Building 24 (Globe Equipment):

- 30-day, 180-day, and 1-year proficiency sampling completed on September 11, 2013, February 7, 2014, and December 5, 2014 respectively.
- One-year confirmatory sampling completed on February 20, 2015.
- TCE concentrations in SS soil vapor probe SS-24-B were slightly greater than the ODH screening level during 1-yr proficiency sampling completed in December 2014 and confirmatory sampling completed in February 2015.
- Tetrachloroethene (PCE) was present in the December 2014 1-yr proficiency IA sample at a concentration greater than the ODH screening level. This was the first and only IA exceedance of PCE measured to date in the samples collected in Building 24.

Next step: Complete additional confirmatory sampling round July 2015.

On June 1, 2015, GHD notified USEPA that the July 2015 VI sampling event at South Dayton Dump and Landfill Site is scheduled for completion between July 13 to 17, 2015.

On June 3, 2015, GHD provided USEPA with a letter designating Julian Hayward as the Project Coordinator for the South Dayton Dump and Landfill Site. On June 3, 2015, USEPA provided its approval of Julian Hayward as Project Coordinator for the South Dayton Dump and Landfill Site removal action.

On June 8, 2015, GHD and USEPA had an in-person meeting in Riverside, Ohio to discuss the July 2015 vapor intrusion sampling and targeted mitigation approaches. Existing vapor intrusion data and possible additions to the existing sub-slab depressurization system were discussed for Building 8 (B&G Trucking), Building 9 (B&G Trucking), Building 12 (Overstreet Painting), Building 12 (S&J Precision), Building 14 (Bullseye Amusements), Building 15 (SIM Trainer), and Building 24 (Globe Equipment). The following locations were proposed for inclusion in the July sampling event:

Building 8 (B&G Trucking)

- SS-8-A, SS-8-B, SS-8-D
- IA-8-A, IA-8-D, IA-8-F

Building 9 (B&G Trucking)

- SS-9-A
- IA-9-A, IA-9-B

Building 12 (Overstreet Painting and S&J Precision)

Overstreet Painting

- SS-12-OP-A, SS-12-OP-B

- IA-12-OP-A, IA-12-OP-B

S&J Precision

- SS-12-SJ-B, SS-12-SJ-D
- IA-12-SJ-B, IA-12-SJ-D

Building 14 (Bullseye Amusements)

- SS-14-A
- IA-14-C

Building 15 (SIM Trainer)

- SS-15-A, SS-15-C
- IA-15-A, IA-15-C
 - Samples will be analyzed for TO-15 VOCs and methane
 - Additional samples will be collected at SS-15-A and IA-15-A for radon analysis

Building 24 (Globe Equipment)

- SS-24-B
- IA-24-B

On June 25, 2015, USEPA and the Respondents participated in a conference call regarding the status of vapor intrusion mitigation.

During the June 25 conference call, the participants discussed the following topics:

- The July sampling round has been scheduled for the week of July 13, 2015. GHD will provide USEPA with a preliminary schedule by July 3, 2015 and will contact Brandon Helm (Tetra-Tech) with field scheduling details.
- GHD provided a brief summary of the proposed testing locations, as discussed during the June 8, 2015 meeting with USEPA in Riverside, Ohio:
 - GHD will collect vacuum readings from all probes and extraction points at each building being sampled.
 - GHD has ordered 1 splitter per building for USEPA split samples.
- A conference call is scheduled between USEPA and GHD for August 6, 2015 at 2:30 PM ET to schedule an in-person meeting.

Summaries of all Anticipated and Planned Resolutions

As previously discussed with USEPA, a number of the owners and tenants in buildings planned for vapor mitigation have expressed concerns regarding the intrusion that the VI sampling and mitigation has had, and will have, on their business. The owners of the buildings (i.e., South Dayton Remediation

Trust) refused to allow additional work to occur. On October 24, 2014, the Respondents transmitted letters to the owners and tenants of the buildings with remaining sub-slab issues providing the analytical results for sampling completed to date and seeking their consent to cease intrusive vapor abatement activities and transition to an enhanced indoor air monitoring program. In January 2015, the legal counsel for the owners provided written notification that the owners and tenants agree to allow indoor air monitoring to proceed but were not willing to allow further remedial work.

Projected Work for the Next Reporting Period

- The results of the recent groundwater monitoring event will be evaluated upon receipt of laboratory results and completion of data validation.
- The Respondents and USEPA will continue to work together to address vapor intrusion issues at and in the vicinity of the Site. VI sampling is scheduled for July 13 to 17, 2015.
- The Respondents and USEPA On-Scene Coordinator will continue to work together to discuss VI mitigation measures and implement the mitigation work plan.
- The Respondents will review and respond to the USEPA response to the Good Faith Offer letter and comments on the new ASAOC and SOW.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD



Julian Hayward

BR/cb/1

Encl.

cc: (all by pdf) Leslie Patterson, U.S. EPA
Wendell Barner, Barner Consulting
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